



**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE  
STATE OF CALIFORNIA**

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Order Instituting Rulemaking to Establish the  
California Institute for Climate Solutions.

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R.07-09-008  
(Filed September 20, 2007)

**OPENING COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY**  
**(U 333-E) ON ORDER INSTITUTING RULEMAKING TO CONSIDER**  
**ESTABLISHING CALIFORNIA INSTITUTE FOR CLIMATE SOLUTIONS**

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**November 2, 2007**

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE  
STATE OF CALIFORNIA**

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**I.**

**INTRODUCTION**

Pursuant to the California Public Utilities Commission's (Commission) September 20, 2007 Order Instituting Rulemaking to Establish the California Institute for Climate Solutions (the Order), Southern California Edison Company (SCE) submits the following Opening Comments and Answers to the questions posed by the Commission at pages 8 through 10 of the Order.

SCE agrees that climate change is a serious public policy concern which deserves the Commission's careful attention. SCE supports and encourages development of technology for renewables, energy efficiency, nuclear and clean coal use that will allow California, the United States, and countries around the world to transition to a lower carbon-emitting society. SCE also believes that California can lead the country and the globe to a lower carbon footprint by transferring technology for clean energy and better energy efficiency that has already been developed and by developing new transferable technology. For these reasons, SCE supports the Commission's efforts to develop a coordinated statewide effort to research solutions to the challenge of climate change.

SCE is concerned, however, with the approach the Commission has chosen to take in funding the California Institute for Climate Solutions (CICS or the Institute) Proposal. The Order essentially proposes that a very limited set of people – the customers of the state’s three largest Investor-Owned Utilities (IOUs) – bear the cost of research that would benefit the entire state, and arguably the entire world. Such a funding mechanism is inequitable, and should be modified to ensure that all people who will benefit from the research pay for its costs.

In these comments, SCE first addresses the issue of funding equity noted above. Next, SCE responds to the questions identified by the Commission to which parties are invited to respond. Lastly, SCE addresses the procedural issues identified in the Order.

## **II.**

### **OPENING COMMENTS**

#### **A. The CICS Should Be Funded by All Californians.**

Because the effect of emissions on climate change is a statewide and global problem, and given the broad scope of the CICS Proposal, the cost of this research effort should be borne by all Californians and not just IOU customers. The Order seeks to establish an institute that will “support achievement of *California’s* GHG reduction goals” by conducting research, training the next generation of researchers and professionals, and disseminating knowledge widely to public and private sector professionals.<sup>1</sup> As described in the UC CICS Proposal, the CICS will address broadly the challenges of climate change and “design a broad set of policies that will target critical carbon-intensive sectors of the California economy.”<sup>2</sup> The Order notes that program research areas will not be limited to energy sector solutions, but rather will contemplate and allow for research on GHG reduction strategies in non-energy sectors, as well as broad public policy considerations and research metrics such as “climate forecasts and analysis,”

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<sup>1</sup> Order, p. 5 (emphasis added).

<sup>2</sup> Appendix A, p. 3.

“governance, policy, and management,” and “quality of life.”<sup>3</sup> The CICS will focus on activities and research that will benefit the entire state – and arguably the nation and entire world. Nevertheless, the Order seeks to impose the cost of the CICS solely on the ratepayers of the State’s three largest IOUs.<sup>4</sup> Such a funding mechanism is inequitable. Broad public policy initiatives that benefit the entire State should be funded by all members of the State, preferably through a broadly-applied tax.

The Order recognizes that combating the challenge of climate change will require California to draw on the State’s collective financial capital.<sup>5</sup> However, as currently proposed, non-energy sectors will not be contributing to the funding of the CICS, despite the fact that sources indicate that electric power is responsible for only 20% of the estimated climate warming pollution.<sup>6</sup> Further, the proposal does not include all energy sector participants. Municipal utility customers (which make up approximately 22% of electricity consumers), will not share any costs of the CICS recovered through electric rates.<sup>7</sup>

An equitable funding mechanism is most imperative now, when California’s electricity rates are the highest in the country and there continues to be substantial upward pressure on rates.<sup>8</sup> Furthermore, such upward rate pressure is exacerbated by the rate cap imposed by Assembly Bill 1X on residential customers’ usage below 130% of their baseline allowance. Due to the AB 1X rate cap, the 40% of IOU residential electricity ratepayers whose electricity usage consistently falls below 130% of their baseline allowance will not bear any of the CICS costs

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<sup>3</sup> Appendix A, Section 3b.

<sup>4</sup> The Order is not clear concerning whether the proposed cents per kWh charge will be imposed on all IOU ratepayers or only IOU bundled customers. For purposes of these comments, SCE assumes that the Commission intends to fund the Institute through charges that will be assessed on both bundled and Direct Access customers.

<sup>5</sup> Order, p. 4.

<sup>6</sup> See, e.g., Environment California website at [http://www.environmentcalifornia.org/global-warming/california-sources#\\_ftn4](http://www.environmentcalifornia.org/global-warming/california-sources#_ftn4) (citing CalEPA Climate Action Team Final Report, p. 11.) According to this information, the Transportation and Industrial sectors together are responsible for the majority of GHG emissions.

<sup>7</sup> See [http://www.energy.ca.gov/electricity/utility\\_sales.html](http://www.energy.ca.gov/electricity/utility_sales.html)

<sup>8</sup> The Order does not analyze or mention what effect the CICS will have on rates.

associated with electric rates. Thus, after discounting municipal utility customers and the 40% of IOU residential customers that are protected by the AB 1X rate cap provisions, the final proportion of electricity customers who would be paying to fund the CICS falls to about 50%.<sup>9</sup> Thus, only half of California's electricity consumers will be responsible for funding an institute which has statewide (and global) benefits.

For these reasons, SCE recommends that the Commission (and CEC and State legislature, if necessary) explore alternative funding mechanisms for this broad initiative. These alternative sources should include not only IOU customers, but all other members of the public who benefit from the research. For example, the Commission may consider complimentary funding through a tax or bond measure so that all residents in the State will fund the Institute, regardless of whether they are municipal utility customers, Direct Access customers, or IOU customers. The Commission could then adjust the funding borne by energy ratepayers to appropriately reflect the costs of the Institute associated with its activities focused on energy-sector solutions. Whatever funding mechanism the Commission chooses, it must ensure that IOU customers alone do not bear the costs of an institute that would conduct non-energy related research and provide benefits to the entire State and others outside of the State. At a minimum, municipalities and all other non-IOU load serving entities should pay their equitable share of the CICS.

## **B. Responses to Questions**

### **1. Is there a need for the kinds of research and educational programs outlined in the proposal?**

**Response:** There is a need for the kinds of research and educational programs outlined in the proposal. SCE agrees that "Research and education are critical components in identifying, developing and implementing solutions to climate change,

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<sup>9</sup> Excluding 40% of the IOUs' residential population (or 3.7 million customers) due to AB1X protections leaves only 6.7 million IOU customers to pay for this initiative. This is about half of the total statewide electric customer population of 13.5 million.

and the UC can serve as a key partner supporting the efforts of business and government.”<sup>10</sup> However, care must be taken so as not to duplicate the efforts of other reputable research programs and to maximize the effectiveness of our scarce resources to address the climate challenge. There are many other organizations and governmental agencies that are “identifying and helping to design a broad set of policies that target critical carbon-intensive sectors of California economy.”<sup>11</sup> These organizations include the California Air Resources Board, the Air Quality Management District, the CEC, the Federal EPA, CalEPA, and other educational and research institutions. The critical question is how the CICS would be structured such that it would complement and not duplicate (or contradict) the work already being done by other organizations. The CICS Proposal currently contains no safeguards or provisions to ensure that non-duplicative research is performed.

SCE recommends that the Commission define specifically the goal(s) of the research to be conducted and then allow all research and educational institutes to make proposals to achieve those goals. The Commission should undertake a review of past and current research on climate change issues and develop checks and balances to ensure that any new research endeavors are complimentary and non-duplicative.

**2. If so, should they be centralized in a manner similar to that described in the UC proposal?**

**Response:** It is not clear how the kinds of research outlined in the UC proposal should best be housed and coordinated. At this time, the CICS Proposal is not detailed enough to determine whether the research programs are duplicative of other research being conducted, and whether the research proposed is appropriately centralized at the UC. It is important to understand the role that the CICS will play in conjunction with the

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<sup>10</sup> Order, Appendix A, p. 2.

<sup>11</sup> Order, Appendix A, p. 3.

roles being played by other research initiatives. For example, the California Energy Commission's Public Interest Energy Research (PIER) program currently manages an annual budget of approximately \$62 million, funded by IOU customers. This is approximately the same annual budget being proposed for the CICS. A firm understanding is needed on how the CICS would complement the research being undertaken by the PIER program.

It would be beneficial to dissect each of the priority program areas identified in Section 3b of Appendix A to determine where each research area would be best housed and the role that the UC and other educational and research institutions can play in its development. As SCE states above, SCE recommends that the Commission define specifically the goal(s) of the research to be conducted and then allow all research and educational institutions to make proposals to achieve those goals.

**3. Is the budget identified in the UC proposal reasonable given the goals of the Institute?**

**Response:** It is difficult to assess the reasonableness of the budget contained in the UC proposal without more detail concerning the tasks envisioned under "Research and Development Programs" and "Strategic Opportunities." Also, "Indirect Costs" of 26% is a significant amount and it is important to understand the components of that cost. This detail is lacking in the CICS Proposal.

**4. What role should the California Public Utilities Commission (CPUC) play in overseeing climate-change related research and educational programs, and how should the CPUC coordinate efforts with other state agencies?**

**Response:** As a compliment to the climate change areas that CARB, the CEC, AQMD, CalEPA, and FedEPA are charged with administering and developing, SCE believes that the Commission's role should be focused on initiatives related to generation and consumption of electricity, with a focus on reducing GHG emissions, including

continued work on Energy Efficiency, Demand Response, and alternative energy programs. To the extent the Commission moves forward with the CICS as currently proposed, the Commission would also be responsible for ensuring that the program is conducted in a way as to maximize customer value. The Commission should coordinate efforts with other state agencies to minimize overlap, maximize effectiveness, and leverage resources among all the various state research efforts currently underway.

**5. How should climate change-related research and education programs like those identified in the UC proposal be funded? Should programs be funded through a rate surcharge?**

**Response:** Please see SCE's Comments in Section A above. The research and education areas identified in the UC proposal are broad in scope, and as such should be funded by all Californians, not just the ratepayers of IOUs. Because the benefits of the CICS would not be limited to IOU ratepayers, SCE recommends that all who could benefit from this research initiative should pay their fair share for it. SCE recommends that the Commission and State legislature explore alternative funding sources that will reach all residents and GHG emission sectors in addition to IOU ratepayers (such as a tax or a statewide bond measure). Additional definition is needed concerning the proposed research and institute objectives to determine the appropriate funding to be borne by IOU ratepayers. The portion of the Institute funded by SCE ratepayers should be recovered from SCE's customers through the Public Purpose Programs charge, along with all of the other adopted Public Purpose Programs such as Energy Efficiency and Low Income programs.



6. **If so, is an equal cents per kilowatt hour and/or equal cents per therm rate mechanism the appropriate way to distribute the costs of funding the proposed institute?**

**Response:** The portion of the CICS funded by SCE ratepayers should be recovered through the Public Purpose Programs charge, as recommended immediately above.

7. **Are there other funding sources, public or private, that should contribute to the Institute?**

**Response:** To be equitable and fair, other funding sources, public or private, should be sought. Consideration should be given to funding the CICS entirely by donations from the public or private sector, or from a broadly-based tax. Donations from other funding sources could be used to reduce the burden on utility customers.

8. **Should shareholders bear some portion of the cost of funding the Institute, and, if so, how should the contribution be structured?**

**Response:** IOU shareholders should not be directed to bear any portion of the cost of funding the Institute. This question raises significant issues concerning the extent of Commission authority to order such funding activity. Regardless, the appropriate policy is for the cost of the program to be borne by all California residents because developing solutions to the climate challenge is in the public's best interest. It would be inequitable to impose the costs of the CICS on the shareholders of one particular industry segment, when that program will benefit the public at large, including customers of non-IOUs and non-utilities.

9. **How should funds be allocated between administration, technological research, public policy research, and educational programs?**

**Response:** Administration costs should be kept to a minimum. Although technological research, public policy research, and educational programs are all important, consideration should be given to provide a larger share to technological research. Breakthroughs in technology hold the promise to significantly reduce greenhouse gas emissions in a cost-effective manner over the longer term.

10. **How should the proposed governance structure be organized so that that the Commission maintains enough control to ensure that ratepayer funds are allocated so as to maximize ratepayer benefits?**

**Response:** If the Commission decides to fund this proposal solely through the use of ratepayer funds, SCE recommends that the Commission be represented on the Governing Board and play a role throughout the governance structure to ensure that the research activities are performed for the benefit of the ratepayers. In addition, all of the IOUs should be represented at least at the Steering Committee level to help direct the UC leadership in seeking research initiatives that would be of direct benefit to their customers. Asking IOU customers to provide an additional \$60 million per year for public-interest research activities requires a strong commitment to ensure that these limited resources are utilized prudently.

11. **What performance measures or other general guidelines should be placed on funding to ensure that funds are used efficiently and in a manner that maximizes ratepayer benefits?**

**Response:** SCE agrees that performance measures need to be established to assure that the research monies are well spent. These measures are not contained in the

current CICS Proposal. Cost effectiveness, timelines, work products and deliverables are among the performance measures that should be considered in this initiative.

**12. What should be the precise role of the proposed Stakeholder Committee in relation to the proposed Steering Committee?**

**Response:** The Commission should seek to minimize redundancy between the activities of the Stakeholder Committee and the Steering Committee. All committees, councils and other governance entities should have well defined roles with clear distinctions of the functions among them.

**13. How does the proposed institute relate to or complement other publicly funded research programs and facilities such as PIER, Helios, or the Energy Biosciences Institute?**

**Response:** SCE believes that there is a need to focus on the development and demonstration of new technologies that show the promise of reducing GHG emissions in a cost effective manner. The CICS should review other publicly funded research programs to identify opportunities for the development of new technologies. The CICS could then work to develop these new technologies.

The California Energy Commission currently has ten research initiatives within its PIER program, one of which is its Climate Change Program. The Commission must ensure that the CICS does not duplicate the work of PIER and other research activities. The CICS effort should have PIER representatives on its Governing Board and/or Steering Committees to ensure the necessary level of coordination and oversight.

14. **If the Commission decides to fund an institute like that described in the proposal, should the level of ratepayer funding that goes towards other, related research and development programs decrease or change?**

**Response:** More information concerning other GHG research is needed to respond to this question. Whether other research and development programs should continue at their current budget levels would depend on the priorities of the UC initiative and specifications for other related research and development programs. None of this detail is provided in the CICS Proposal.

15. **What additional priority program areas for research and education should be added to those outlined in the proposal?**

**Response:** SCE does not have a recommendation at this time.

16. **Given that it is the Commission's intent to draw on the resources of not only UC, but also Cal Tech, Stanford, USC, California State University and the Community College systems, is the organizational structure described in the proposal a suitable framework to efficiently and effectively coordinate this kind of broad participation?**

**Response:** SCE agrees that the Institute should be open to all educational and research institutions. Consideration should be given to having those institutions represented at some level of the governance structure based on their respective roles in the program. It is important that the research activities envisioned by the CICS Proposal do not overlap those that may already be undertaken by other educational institutions.

**17. How can the Commission ensure that the institute's educational outreach and worker training programs reach diverse communities in California?**

**Response:** The Commission would best ensure that the Institute's programs reach diverse communities by creating specific criteria and a disciplined process to be followed by program administrators. This proceeding would offer the vehicle by which to identify and select the criteria and design the administrative process.

**18. If research conducted by the Institute results in profitable technologies or patents, should some portion of the profits be used to reimburse ratepayers for the cost of the research? If so, how should this be structured?**

**Response:** Serious consideration should be given to use at least a portion of the funds for the CICS to develop, demonstrate and possibly patent real technology advances. Any profits from the research efforts such as patents and royalties should flow back to the ratepayers similar to existing Commission-approved, revenue sharing mechanisms in the proportion that the ratepayers funded the CICS.

**C. Procedural Issues**

**Categorization of Proceeding.** SCE agrees with the Commission's preliminary categorization of this proceeding as "ratesetting" pursuant to California Public Utilities Commission Rule of Practice and Procedure Rule 1.3. SCE does not agree that the proceeding should be categorized as "adjudicatory" as argued by the Consumer Federation of California. This Rulemaking is not an "enforcement investigation" concerning a violation of statutory law or rule of the Commission or a complaint case.

**Need for Hearings.** At this time, SCE does not believe that hearings are necessary to address the issues raised in the Order. Rather, the Order appears to raise high level policy considerations that could be addressed through workshops and written comments. To the extent that Parties' comments raise contested issues of fact, however, SCE believes hearings may be

necessary. If the Commission does not determine that hearings are necessary at this time, SCE requests the opportunity to file a motion requesting hearings after the filing of opening and reply comments.

### **III.**

#### **CONCLUSION**

SCE appreciates the opportunity to file opening comments on the Order and looks forward to participating fully in Rulemaking 07-09-008.

Respectfully submitted,

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November 2, 2007

**CERTIFICATE OF SERVICE**

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of OPENING COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) ON ORDER INSTITUTING RULEMAKING TO ESTABLISH THE CALIFORNIA INSTITUTE FOR CLIMATE SOLUTIONS on all parties identified on the attached service list(s). Service was effected by one or more means indicated below:

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First class mail will be used if electronic service cannot be effectuated.

Executed this **2nd day of November, 2007**, at Rosemead, California.

/s/ NAPA UTRAPIROMSUK

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**R.07-09-008**

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